

1 Avi Wagner (SBN 226688)
2 THE WAGNER FIRM
3 1925 Century Park East, Suite 2100
4 Los Angeles, California 90067
5 Telephone: (310) 491-7949
6 Facsimile: (310) 694-3967
7 Email: avi@thewagnerfirm.com

8 *Attorney for Cross-Defendant and Cross-Plaintiff*
9 *WHOLESALEFASHIONSQUARE.COM, INC.*

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 WINESTER COMPANY,
13
14 Cross-Plaintiff,
15 v.
16 WHOLESALEFASHIONSQUARE.C
17 OM, INC., a California Corporation,
18
19 Cross-Defendant.

20 WHOLESALEFASHIONSQUARE.C
21 OM, INC., a California corporation,
22 Cross-Plaintiff

23 vs.

24 ANDREW J. PARK, an individual, J &
25 K CLOTHING, INC. d/b/a LOVE
26 LETTER COLLECTION a.k.a. MI
27 AMORE F/S, a California Corporation;
28 YOUNG H. CHO, an individual,
SOYEON CHO, an individual,

Case No. 2:19-CV-00283-CBM-AFM

Hon. Consuelo B. Marshall

Magistrate Alexander F. MacKinnon

**JOINT STIPULATION
CONTINUING FINAL PRE-TRIAL
CONFERENCE AND TRIAL
DATE**

*Proposed Order filed concurrently
herewith*

1 SKYOCEAN, INC., a California
2 Corporation and; DOES 1-10,
3 individuals and/or entities of unknown
4 form,

5 Cross-Defendants.

1 Cross-Plaintiff and Cross-Defendant Wholesalefashionsquare.com, Inc.
 2 (“WFS”), Cross-Plaintiff Winester Company (“Winester”), Cross-Defendants Young
 3 H. Cho, Soyeon Cho, and Skyocean, Inc. (collectively hereinafter referred to as
 4 “Skyocean”), and Andrew J. Park, and J & K Clothing, Inc. dba Love Letter Collection
 5 (collectively, “Love Letter”) by and through their respective counsel of record, hereby
 6 agree and stipulate as follows:

7 1. WHEREAS, on May 4, 2021, Winester submitted its Motion for
 8 Summary Judgment that is now pending the Court’s ruling;

9 2. WHEREAS, the hearing on this Motion took place on June 15, 2021 at
 10 10:00 a.m. and the Court took the Motion under submission;

11 3. WHEREAS, based on the pending Motion for Summary Judgment ruling,
 12 and in an effort to save litigation expenses/resources, the Parties all agree and stipulate
 13 to continue the current Final Pre-Trial Conference date and the Trial date;

14 4. WHEREAS, the Parties all request to meet and confer regarding pre-trial
 15 logistics within 30-days from the date the Court provides its ruling for the pending
 16 Motion for Summary Judgment;

17 5. WHEREAS, the parties submit that good cause exists for granting the
 18 relief sought herein. The continuation of the current Final Pre-Trial Conference and
 19 Trial dates until the Court rules on Winester’s outstanding Motion for Summary
 20 Judgment would allow all parties and this Court to save on avoidable expenses and
 21 resources;

22 NOW THEREFORE, by and through their counsel of record, the Parties hereby
 23 stipulate and respectfully move this Court to enter an Order as follows:

24 1. To allow the Parties to meet and confer regarding pre-trial logistics within
 25 30-days from the date the Court provides its ruling on the pending Motion for
 26 Summary Judgment;

27 2. To continue the Final Pre-Trial Conference from October 19, 2021 to
 28 January 3, 2021 at 2:30 p.m.; and

1 3. To continue the trial date from November 2, 2021 to January 18, 2021 at
2 10:00 a.m.

3
4
5 Dated: September 7, 2021

THE WAGNER FIRM

6 By: /s/ Avi Wagner

7 Attorney for Cross Defendant/Cross-
8 Plaintiff Wholesalefashionsquare.com,
9 Inc.

10
11 Dated: September 7, 2021

BUCHALTER

12 By: /s/ Matthew Seror

13 Matthew L. Seror
14 Aaron M. Levine
15 Attorneys for Cross-Plaintiff Winester
 Company

16 Dated: September 7, 2021

LAW OFFICES OF S. CALVIN
17 MYUNG

18
19 By: /s/ S. Calvin Myung

20 S. Calvin Myung
21 Attorney for Cross-Defendants
22 YOUNG H. CHO, SOYEON CHO, and
 SKYOCEAN, INC.

23 Dated: September 7, 2021

LAW OFFICES OF FANG CHEN

24 By: /s/ Fang Chen

25 Fang Chen
26 Attorney for Cross-Defendants
27 ANDREW J. PARK, and J&K
28 CLOTHING, INC. D/B/A LOVE
 LETTER COLLECTION

1
2 Pursuant to Local Rule 5-4.3.4, I, Avi Wagner, hereby attest that all other
3 signatories to this Stipulation, and on whose behalf it is submitted, concur in its content
4 and have authorized its filing.
5

6 Dated: September 7, 2021

/s/ Avi Wagner
Avi Wagner